

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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*IN RE* TERRORIST ATTACKS ON SEPTEMBER 11, 2001  
\_\_\_\_\_

)  
) No. 03 MDL 1570 (GBD/SN)  
) ECF Case  
)

**Motion to Withdraw as Attorney of Record**

Undersigned counsel for defendant Perouz Sedaghaty, hereby respectfully move to withdraw as counsel for him, pursuant to Local Civil Rule 1.4.

Mr. Sedaghaty recently filed a petition for relief under Title 7 of the United States Bankruptcy Code, in the U.S. Bankruptcy Court for the District of Oregon (No. 17-31541-tmb7, docketed April 26, 2017).

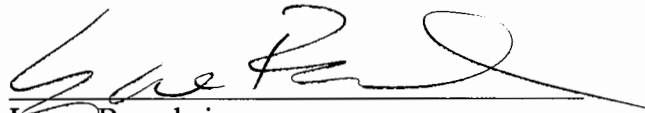
Undersigned counsel seek leave to withdraw, since professional considerations require termination of the representation pursuant to Rule 1.16(b), D.C. Rules of Professional Conduct (which is similar to Rule 1.16(c) of the New York Rules of Professional Conduct). *See also* N.Y. State Bar Ass'n Comm. on Prof'l Ethics, Advisory Op. 1057 (2015), 2015 WL 4592234, at \*3 ("the Rules anticipate that the court will usually not demand the disclosure of confidential information if the lawyer advises the court that 'professional considerations' require withdrawal").

Mr. Sedaghaty has consented to the proposed relief. As this case was automatically stayed as to him, pursuant to the provisions of 11 U.S.C. § 362, he will not be able to participate in the litigation in this Court pending resolution of the bankruptcy proceedings.

Pursuant to Local Civil Rule 1.4, undersigned counsel state that they are not asserting a retaining or charging lien. A copy of this motion has been served on Mr. Sedaghaty.

A proposed Order is attached hereto.

Respectfully submitted,

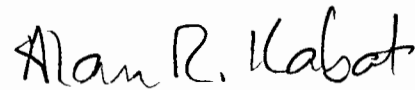
A handwritten signature in black ink, appearing to read 'Lynne Bernabei', written over a horizontal line.

Lynne Bernabei  
Alan R. Kabat  
Bernabei & Kabat, PLLC  
1775 T Street, N.W.  
Washington, D.C. 20009-7102  
(202) 745-1942

DATED: April 28, 2017

**CERTIFICATE OF SERVICE**

I hereby certify that on April 28, 2017, I caused the foregoing to be served electronically on counsel of record by the Court's Electronic Case Filing (ECF) System, pursuant to ¶ 9(a) of Case Management Order No. 2 (June 16, 2004). A copy was also served by electronic mail and by first class mail, postage prepaid, upon Mr. Sedaghaty.



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Alan R. Kabat